

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED:	_____
v.	:	CRIMINAL NO.	_____
DEBRA ANN NULL	:	VIOLATIONS:	18 U.S.C. § 1341 (Mail fraud - 1 Count) 18 U.S.C. § 1344 (Bank fraud - 1 Count)

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. The defendant, DEBRA ANN NULL, was employed as a bookkeeper and secretary by Pickering Valley Landscape, Inc. ("PVL").

2. As a secretary and bookkeeper, the defendant, DEBRA ANN NULL, had access to certain bank account records and was authorized to write certain checks to pay legitimate expenses of PVL.

3. As a secretary and bookkeeper, the defendant, DEBRA ANN NULL, was paid a weekly salary in the form of a payroll check issued by PVL. NULL earned approximately \$28,000 per year. The only other compensation which she was entitled to receive was reimbursement for travel or business expenses incurred in

connection with her employment such as gas charges resulting from going to the post office or office supply store.

4. PVL maintained certain corporate credit cards for the use of certain officers and employees of PVL. The defendant, DEBRA ANN NULL, was never an authorized user of any of these corporate accounts.

5. PVL maintained business checking accounts at Elverson National Bank, a division of National Penn Bank, a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation. In addition, the owner of PVL maintained a personal checking account at Elverson National Bank.

6. The defendant, DEBRA ANN NULL, maintained a personal checking account at Elverson National Bank.

THE SCHEME TO DEFRAUD AND TO OBTAIN MONEY

7. From in or about February, 1998, to in or about October, 2001, at Glenmoore, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

DEBRA ANN NULL,

devised and intended to devise a scheme to defraud Pickering Valley Landscape, Inc. and its owner, and to obtain money and property from them by means of false and fraudulent pretenses, representations, and promises.

THE OBJECT OF THE SCHEME

8. The object of the scheme was for the defendant, DEBRA ANN NULL, to obtain money and property for her benefit in the total amount of \$414,864.49 from PVL and its owner by writing unauthorized checks to pay personal expenses.

MEANS OF EXECUTING THE SCHEME

It was part of the scheme that:

9. In or about February, 1998, the defendant, DEBRA ANN NULL, obtained a credit card without authorization in her name on the corporate account of PVL at MBNA America Business Card.

10. From in or about February, 1998, to in or about October, 2001, the defendant, DEBRA ANN NULL, used the MBNA credit card to purchase goods and services and to obtain cash advances for her personal benefit in the total amount of \$313,149.79.

11. From in or about March, 1998, to in or about October, 2001, the defendant, DEBRA ANN NULL, wrote 106 unauthorized checks in the total amount of \$308,409.65 on two accounts maintained by PVL at Elverson National Bank to pay MBNA.

12. From in or about September, 1998, to in or about October, 2001, the defendant, DEBRA ANN NULL, wrote 36

unauthorized PVL checks in the total amount of \$55,201.03 to pay American Express.

13. From in or about April, 1999, to in or about September, 2001, the defendant, DEBRA ANN NULL, wrote 18 other unauthorized PVL checks in the total amount of \$31,281.14 to pay other personal bills and expenses.

14. From in or about February, 1999, to in or about September, 2001, the defendant, DEBRA ANN NULL, wrote 23 unauthorized checks on the account of the owner of PVL in the total amount of \$19,972.67 to pay personal bills and expenses.

THE MAILING

_____15. On or about January 5, 2001, in the Eastern District of Pennsylvania, the defendant,

DEBRA ANN NULL,

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to delivered by mail according to the directions thereon, a PVL check drawn on Elverson National Bank payable to MBNA America Business Card, P.O. Box 15469, Wilmington, Delaware 19886-5469 in the amount of \$5,876.00.

In violation of Title 18, United States Code, Section 1341.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 of Count One are realleged here.

THE SCHEME TO DEFRAUD AND TO OBTAIN MONEYS

2. From in or about February, 1998, to in or about October, 2001, the defendant,

DEBRA ANN NULL,

did knowingly execute a scheme to defraud Elverson National Bank and to obtain moneys owned by and under the custody of Elverson National Bank by means of false and fraudulent pretenses, representations, and promises.

THE OBJECT OF THE SCHEME

_____ 3. The object of the scheme was for the defendant, DEBRA ANN NULL, to obtain money for her benefit in the total amount of \$90,481.14 from the business accounts of PVL and the personal account of its owner at Elverson National Bank by writing unauthorized checks and negotiating these checks, either by depositing them in her personal bank accounts or cashing them.

MEANS OF EXECUTING THE SCHEME

It was part of the scheme that:

4. The defendant, DEBRA ANN NULL, wrote 56 unauthorized PVL checks in the total amount of \$67,927.76 and negotiated the checks.

5. The defendant, DEBRA ANN NULL, wrote 17 unauthorized checks on the account of the owner of PVL in the total amount of \$22,553.38 and negotiated the checks.

In violation of Title 18, United States Code, Section 1344.

PATRICK L. MEEHAN
United States Attorney